

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (SHL)

(Jointly Administered)

**TENTH SUPPLEMENTAL DECLARATION OF
LISA DONAHUE OF ALIXPARTNERS, LLP**

Pursuant to 28 U.S.C. § 1746, I, Lisa Donahue, state under penalty of perjury, that:

1. I am a Partner and Managing Director of AlixPartners, LLP (“**AlixPartners**”),

which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein

and, if called as a witness, would testify competently thereto.

3. I submit this supplemental declaration in the cases of the above-captioned debtors

(collectively, the “**Debtors**”) to supplement the disclosures set forth in my original declaration

dated November 5, 2019 [ECF No. 429], my supplemental declaration dated December 5, 2019

[ECF No. 578], the supplemental declaration of Jesse DelConte of AlixPartners, LLP dated

December 18, 2019 [ECF No. 671], my supplemental declaration dated December 19, 2019 [ECF

No. 678], my supplemental declaration dated December 15, 2020 [ECF No. 2137], my

supplemental declaration dated March 12, 2021 [ECF No. 2468], my supplemental declaration

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Purdue Products L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

dated August 30, 2021 [ECF No. 3697], my supplemental declaration dated April 20, 2022 [ECF No. 4677], and my supplemental declaration dated December 5, 2022 [ECF No. 5277].

4. Unless otherwise noted, references to AP below collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

- Aetna, Aetna Health Management and Aetna Life Insurance Co., vendors to the Debtors, are employee benefits providers to AP.
- Alvendia, Kelly & Demarest LLC, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- American Express, a vendor to the Debtors, and affiliates, are vendors to AP, which vendor relationship includes an incentive program based on value but is not attributable to any particular person or specific purchases.
- BDO USA LLP, a vendor to the Debtors, and affiliates, are lessors to a former AP client in matters unrelated to the Debtors.
- Brinks Gilson & Lione, counsel to the Debtors, is a professional to a current AP client in matters unrelated to the Debtors.
- Burg Simpson, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Caplin & Drysdale, a professional in this bankruptcy matter, is counsel to a current AP client in matters unrelated to the Debtors.
- CaremarkPCS Health LP, CVS, CVS Caremark, CVS Caremark Part D Services, L.L.C., Caremark PCS Health, L.L.C., CVS Distribution, CVS Health Solutions, L.L.C., CVS Pharmacy Inc. and CVS RX Services, Inc., vendors, customers and creditors to the Debtors, and affiliates, are employee benefits providers to AP.
- CenturyLink, a utility provider to the Debtors, is an affiliate to a current AP client in matters unrelated to the Debtors.
- Chehardy, Sherman, Williams, Murray, Recile, Stakelum & Hayes LLP, opposing counsel to the Debtors, is a professional and counsel to current AP clients in matters unrelated to the Debtors.

- Citibank, a banking service provider to the Debtors, and affiliates (“**Citi**”), are lienholders and parent companies to current and to former AP clients in matters unrelated to the Debtors. Citi is a GSS client.²
- City and County of Denver, an adverse litigation party to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- Clariant Corporation, a vendor to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Cobb County, a plaintiff in this bankruptcy matter, is a bondholder and litigation party to current and former AP clients in matters unrelated to the Debtors.
- Commonwealth of PA, a plaintiff in this bankruptcy matter, is a bondholder and lender to current and former AP clients in matters unrelated to the Debtors.
- Commonwealth of Massachusetts, a plaintiff in this bankruptcy matter, is a bondholder and litigation party to former AP clients in matters unrelated to the Debtors.
- Commonwealth of Virginia, a plaintiff in this bankruptcy matter, is a bondholder to former AP clients in matters unrelated to the Debtors.
- Cooner & Conway, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Cotchett, Pitre & McCarthy LLP, opposing counsel to the Debtors, is counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors.
- Crueger Dickinson, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Davidson County, a plaintiff in this bankruptcy matter, is a bondholder to a former AP client in matters unrelated to the Debtors.
- Debevoise & Plimpton LLP, counsel to directors/officers to the Debtors, is a former employer of a current AP employee.

² AlixPartners formed and currently holds a majority and controlling ownership interest in GSS UK Holdings Limited (“**GSS**”). GSS and its subsidiaries developed a regulatory technology platform to provide global, centralized sanctions screening services to financial institutions. Various Investors, including certain AlixPartners managing directors and Board members, hold minority ownership interests in GSS. AlixPartners currently has a majority of the seats on the board of directors of GSS. GSS does not share office space or IT systems with AlixPartners, but does share certain employees and services such as finance systems. The names of GSS’s investors and customers (but not its vendors and employees) are loaded into the database where AlixPartners’ connections are stored and are disclosed as part of the disclosure process described herein.

- Dentons US LLP, a vendor to the Debtors, and affiliates, are former employers of a current AP employee.
- Duke University, a vendor to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.
- Factory Mutual Insurance Company, an insurance provider to the Debtors, is a lender to a current AP client in matters unrelated to the Debtors.
- FTI Consulting SC Inc. and FTI Consulting, Inc., vendors and professionals to the Debtors, and affiliates, are current AP clients in matters unrelated to the Debtors.
- FW Webb Co., a vendor to the Debtors, is a litigation party to a former AP client in matters unrelated to the Debtors.
- Gardner Brewer Martinez-Monfort, P.A., opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Goldenberg, Heller & Antognoli, P.C., opposing counsel to the Debtors, is a professional to a current AP client in matters unrelated to the Debtors.
- Gurbir S. Grewal, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Hutchens Law Firm, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Information Resources Inc., a vendor to the Debtors, is a former employer of a current AP employee.
- John Dubel, a director to the Debtors, is a director to a current AP client in matters unrelated to the Debtors.
- Johnson Controls Inc., a vendor to the Debtors, and affiliates, are parent companies to a current AP client in matters unrelated to the Debtors.
- Johnson Gray, opposing counsel to the Debtors, is a lessor to a former AP client in matters unrelated to the Debtors.
- JPMorgan Chase, a banking service provider to the Debtors, is a vendor to AP.
- Kaiser Foundation Hospital, a vendor to the Debtors, is a lender to current and former AP clients in matters unrelated to the Debtors.
- Kroger, a customer to the Debtors, is a former employer of current AP employees.

- Ladenburg B.V., a related entity to the Debtors, and affiliates, are shareholders to a current AP client in matters unrelated to the Debtors.
- Lanier Law, opposing counsel to the Debtors, is opposing counsel to current and former AP clients in matters unrelated to the Debtors.
- Latham & Watkins LLP, special counsel to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Law Office of Robert E. Sweeney, opposing counsel to the Debtors, is opposing counsel to a former AP client in matters unrelated to the Debtors.
- Mallinckrodt Brand Pharmaceuticals, Inc., Mallinckrodt Enterprises Holdings, Inc., Mallinckrodt Enterprises LLC, Mallinckrodt LLC and Mallinckrodt PLC, major co-defendants to the Debtors, and affiliates, are director-affiliated companies to a current AP client in matters unrelated to the Debtors.
- Maynard Cooper Gale, counsel to the Debtors, is counsel to a current AP client in matters unrelated to the Debtors.
- McDermott Will & Emery, counsel to the Debtors' directors and officers, is opposing counsel to a former AP client in matters unrelated to the Debtors.
- McNamee & McNamee, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- MedImpact Healthcare Systems Inc., a vendor to the Debtors, and affiliates, are joint venture entities to a former AP client in matters unrelated to the Debtors.
- Meyers & Flowers, LLC, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Miller Law Firm, opposing counsel to the Debtors, is counsel to a current AP client in matters unrelated to the Debtors.
- Mississippi Department of Revenue, a taxing authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- Morris, Nichols, Arsh & Tunnell, LLP, a vendor and counsel to the Debtors, is counsel to a current AP client in matters unrelated to the Debtors.
- Morrow, Morrow, Ryan, Bassett & Haik, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Nelson Mullins Riley & Scarborough LLP, counsel to the Debtors' directors and officers, is a current AP client in matters unrelated to the Debtors.

- Nielsen Co. LLC, a vendor to the Debtors, and affiliates, are vendors to AP.
- Norton Rose Fulbright US LLP, counsel to the Debtors' directors and officers, are former employers of a current AP employee.
- Ohio Carpenters Health Fund, a plaintiff in this bankruptcy matter, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.
- Ohio Department of Taxation, a taxing authority to the Debtors, is a bondholder and lienholder to current and former AP clients in matters unrelated to the Debtors.
- Open Text Inc., a vendor to the Debtors, is a professional to a current AP client in matters unrelated to the Debtors.
- Oths, Heiser, Miller, Waigland & Clagg, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- PJT Partners, a professional in this bankruptcy matter, is a shareholder to a current AP client in matters unrelated to the Debtors.
- Powell & Majestro, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- PRA Inc., a vendor to the Debtors, and affiliates, are vendors to AP.
- Proofpoint, a vendor to the Debtors, is a vendor to AP.
- Purnell Law, opposing counsel to the Debtors, is opposing counsel to a former AP client in matters unrelated to the Debtors.
- Riker Danzig Scherer Hyland & Perretti, LLP, counsel to the Debtors, is a professional to a current AP client in matters unrelated to the Debtors.
- Riley & Jackson, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Robert Bosch Packaging, a vendor to the Debtors, and affiliates (“**Robert Bosch**”), are affiliates to a current AP client in matters unrelated to the Debtors. Robert Bosch is a former employer of a current AP employee.
- Rodman, Rodman & Sandman, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Safeway Mail Stop, a customer to the Debtors, and affiliates, are related parties, litigation parties, and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.

- Save Mart Modesto Yosemite WHS, a customer to the Debtors, and affiliates, are current AP clients in matters unrelated to the Debtors.
- Seagle Law, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Shaw Keller LLP, counsel to the Debtors, is a professional to a current AP client in matters unrelated to the Debtors.
- Sidley Austin LLP, a vendor and counsel to the Debtors, is opposing counsel to a former AP client in matters unrelated to the Debtors.
- Siemens Industry Inc., a vendor to the Debtors, and affiliates, are former employers of current AP employees.
- Simmons & Simmons, opposing counsel to the Debtors, is opposing counsel to current AP clients in matters unrelated to the Debtors.
- Simon Law Firm, opposing counsel to the Debtors, is a professional to a current AP client in matters unrelated to the Debtors.
- Simpson Thacher & Bartlett, counsel to the Debtors' directors and officers, is counsel to current and former AP clients in matters unrelated to the Debtors.
- Skadden, Arps, Slate, Meagher & Flom LLP (“**Skadden**”), counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors. Skadden is a former legal services provider to AP.
- Skinner Law, a professional in these bankruptcy cases, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- South Carolina Department of Health, a vendor to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors.
- Spears & Imes LLP, counsel to Craig Landau, a former director and officer to the Debtors, is counsel to a former AP client in matters unrelated to the Debtors.
- Squire Patton Boggs US LLP, a vendor to the Debtors, is counsel to former AP clients in matters unrelated to the Debtors.
- Stag Liuzza, L.L.C., opposing counsel to the Debtors, is opposing counsel to a current AP client in matter unrelated to the Debtors.
- Stevens Lee, a professional in this bankruptcy matter, is counsel to current AP clients in matters unrelated to the Debtors. Stevens Lee is a current AP client in matters unrelated to the Debtors.

- Stikeman Elliott, LLP, counsel to the Debtors, is a legal services provider to AP.
- Syntegon US Holdings Inc., a vendor to the Debtors, and affiliates, are current AP clients in matters unrelated to the Debtors.
- Terrell Hogan, a professional in this bankruptcy matter, is opposing counsel to a former AP client in matters unrelated to the Debtors.
- Texas State Comptroller, a taxing authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- The Commonwealth of Puerto Rico, an adverse litigation party to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- The Diaz Law Firm, opposing counsel to the Debtors, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- UBS Group AG, UBS AG Stamford, and UBS Financial Services, Inc., landlords, vendors and insurance providers to the Debtors, and affiliates, are GSS clients.
- United Parcel Service and UPS Supply Chain Solutions, vendors to the Debtors, and affiliates, were members of the official committee of unsecured creditors that retained AP in Bluestem Brands, Inc., a former bankruptcy matter unrelated to the Debtors.
- Univar USA Inc., a vendor to the Debtors, is a related party to a current AP client in matters unrelated to the Debtors.
- Ward & Smith, opposing counsel to the Debtors, is opposing counsel to current AP clients in matters unrelated to the Debtors.
- Waters Corporation, a vendor to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Watts Guerra LLP, a multi-state group entity and opposing counsel to the Debtors, is a current AP client in matters unrelated to the Debtors.
- West Bend Mutual Insurance Company, an adverse litigation party to the Debtors, is a lender to a current AP client in matters unrelated to the Debtors.
- West Virginia State Tax Department, a taxing authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- Willis Towers Watson US LLC, a vendor to the Debtors, and affiliates (“WTW”) are adverse litigation parties to a former AP client in matters unrelated to the Debtors. WTW is a current AP client in matters unrelated to the Debtors.

- Yale University, a vendor to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.

5. AlixPartners does not believe that the supplemental disclosures above impact its disinterestedness. I continue to reserve the right to supplement AlixPartners' disclosures in the event that AlixPartners learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, AlixPartners will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Dated: August 21, 2023
New York, New York

AlixPartners, LLP

/s/ Lisa Donahue
Lisa Donahue
Partner & Managing Director